

1 DAVID H. KRAMER, SBN 168452
2 Email: dkramer@wsgr.com
3 MAURA L. REES, SBN 191698
4 Email: mrees@wsgr.com
5 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300

6 ERIC P. TUTTLE, SBN 248440
7 Email: eric.tuttle@wsgr.com
8 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
701 Fifth Avenue, Suite 5100
Seattle, WA 98104-7036
9 Telephone: (206) 883-2500

10 *Counsel for Defendant*
GOOGLE LLC

LESLEY E. WEAVER, SBN 191305
Email: lweaver@bfalaw.com
ANNE K. DAVIS, SBN 267909
Email: adavis@bfalaw.com
JOSHUA D. SAMRA, SBN 313050
Email: jsamra@bfalaw.com
BLEICHMAR FONTI & AULD LLP
1330 Broadway, Suite 630
Oakland, CA 94612
Telephone: (415) 445-4003

GREGORY MULLENS (admitted *pro hac vice*)
Email: gmullens@bfalaw.com
BLEICHMAR FONTI & AULD LLP
75 Virginia Road, 2nd Floor
White Plains, NY 10603
Telephone: (415) 445-4006

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class [Additional
Counsel on Signature Page]*

12
13 **UNITED STATES DISTRICT COURT**
14
15 **NORTHERN DISTRICT OF CALIFORNIA**
16
17 **SAN JOSE DIVISION**

18 *In re Google Generative AI Copyright
19 Litigation*

Master File Case No.: 5:23-cv-03440-EKL
Consolidated with Case No.: 5:24-cv-02531-EKL

20
21 **STIPULATION AND [PROPOSED]
22 ORDER EXTENDING BRIEFING
23 SCHEDULE RELATED TO CLASS
24 CERTIFICATION**

25
26 Judge: Hon. Eumi K. Lee
27 Magistrate Judge: Hon. Susan van Keulen
28

1 Plaintiffs and Defendant (collectively, “the Parties”), by and through their respective
 2 counsel of record, hereby stipulate as follows:

3 WHEREAS, on September 18, 2025, the Court issued an Order setting the schedule for
 4 briefing related to class certification (ECF No. 231);

5 WHEREAS, the Order set the deadline for Plaintiffs to file class certification motion and
 6 disclose supporting expert reports on October 14, 2025;

7 WHEREAS, the unredacted version of Plaintiffs’ motion for class certification and expert
 8 reports in support thereof were served on Defendant on October 15, 2025;

9 WHEREAS, the Order further set the deadline for Defendant to file opposition to class
 10 certification motion, disclose opposing expert report(s), and file *Daubert* motion(s) on November
 11 19, 2025; the deadline for Plaintiffs to file reply in support of class certification motion,
 12 opposition(s) to Defendant’s *Daubert* motion(s), and *Daubert* motion(s) as to Defendant’s experts
 13 on December 29, 2025; the deadline for Defendant to file opposition to Plaintiffs’ *Daubert* motions
 14 on January 5, 2026; and the hearing on Plaintiffs’ class certification and related *Daubert* motions
 15 on February 4, 2026;

16 WHEREAS, the Parties have met and conferred and, subject to the Court’s approval, have
 17 agreed that all class certification-related briefing deadlines shall be extended for 1 day, with no
 18 changes to the hearing date;

19 WHEREAS, the requested time modification will not affect any other deadlines for this
 20 case;

21 NOW, THEREFORE, based on the above stipulation, pursuant to Civil Local Rules 6-2
 22 and 7-12, and with Plaintiffs and Defendant reserving all rights and defenses, IT IS HEREBY
 23 STIPULATED by and between the Parties, subject to the approval of the Court, that:

24 1. The deadline for Defendant to file opposition to class certification motion, disclose
 25 opposing expert report(s), and file *Daubert* motion(s) shall be extended to November 20, 2025;

26 2. The deadline for Plaintiffs to file reply in support of class certification motion,
 27 opposition(s) to Defendant’s *Daubert* motion(s), and *Daubert* motion(s) as to Defendant’s experts
 28 shall be extended to December 30, 2025;

1 3. The deadline for Defendant to file opposition to Plaintiffs' *Daubert* motions shall
2 be extended to January 6, 2026;

3 4. The hearing on Plaintiffs' class certification and related *Daubert* motions is
4 unaffected by this Order and remains set for February 4, 2026.

5

6 IT IS SO STIPULATED.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 Respectfully submitted,

2 Dated: November 12, 2025

3 By: /s/ David H. Kramer
4 David H. Kramer, SBN 168452
5 Email: dkramer@wsgr.com
6 Maura L. Rees, SBN 191698
7 Email: mrees@wsgr.com
8 **WILSON SONSINI GOODRICH & ROSATI**
9 **Professional Corporation**
10 650 Page Mill Road
11 Palo Alto, CA 94304-1050
12 Telephone: (650) 493-9300

13 Paul J. Sampson (admitted *pro hac vice*)
14 Email: psampson@wsgr.com
15 **WILSON SONSINI GOODRICH & ROSATI**
16 **Professional Corporation**
17 95 S State Street, Suite 1000
18 Salt Lake City, UT 84111
19 Telephone: (801) 401-8541

20 Eric P. Tuttle, SBN 248440
21 Email: eric.tuttle@wsgr.com
22 **WILSON SONSINI GOODRICH & ROSATI**
23 **Professional Corporation**
24 701 Fifth Avenue, Suite 5100
25 Seattle, WA 98104-7036
26 Telephone: (206) 883-2500

27 *Counsel for Defendant*
28 GOOGLE LLC

18 Dated: November 12, 2025

19 By: /s/ Joseph R. Saveri
20 Joseph R. Saveri (SBN 130064)
21 Cadio Zirpoli (SBN 179108)
22 Christopher K.L. Young (SBN 318371)
23 Evan A. Creutz (SBN 349728)
24 Elissa A. Buchanan (SBN 249996)
25 Aaron Cera (SBN 351163)
26 Louis Kessler (SBN 243703)
27 Alex Zeng (SBN 360220)
28 **JOSEPH SAVERI LAW FIRM, LLP**
29 601 California Street, Suite 1505
30 San Francisco, CA 94108
31 Telephone: (415) 500-6800
32 Facsimile: (415) 395-9940
33 jsaveri@saverilawfirm.com
34 czirpoli@saverilawfirm.com
35 cyoung@saverilawfirm.com
36 ecreutz@saverilawfirm.com
37 eabuchanan@saverilawfirm.com

1 acera@saverilawfirm.com
2 lkessler@saverilawfirm.com
3 azeng@saverilawfirm.com

4 Lesley E. Weaver (SBN 191305)
5 Anne K. Davis (SBN 267909)
6 Joshua D. Samra (SBN 313050)
7 **BLEICHMAR FONTI & AULD LLP**
8 1330 Broadway, Suite 630
9 Oakland, CA 94612
10 Telephone: (415) 445-4003
11 lweaver@bfalaw.com
12 adavis@bfalaw.com
13 jsamra@bfalaw.com

14 Gregory S. Mullens (admitted *pro hac vice*)
15 **BLEICHMAR FONTI & AULD LLP**
16 75 Virginia Road, 2nd Floor
17 White Plains, NY 10603
18 Telephone: (415) 445-4006
19 gmullens@bfalaw.com

20 Ryan J. Clarkson (SBN 257074)
21 Yana Hart (SBN 306499)
22 Mark I. Richards (SBN 321252)
23 **CLARKSON LAW FIRM, P.C.**
24 22525 Pacific Coast Highway
25 Malibu, CA 90265
26 Telephone: 213-788-4050
27 rclarkson@clarksonlawfirm.com
28 yhart@clarksonlawfirm.com
mrichards@clarksonlawfirm.com

20 Tracey Cowan (SBN 250053)
21 **CLARKSON LAW FIRM, P.C.**
22 95 Third Street, Second Floor
23 San Francisco, CA 94103
24 Telephone: (213) 788-4050
25 tcowan@clarksonlawfirm.com

26 Brian D. Clark (admitted *pro hac vice*)
27 Laura M. Matson (admitted *pro hac vice*)
28 Arielle S. Wagner (admitted *pro hac vice*)
Consuela Abotsi-Kowu (admitted *pro hac vice*)
LOCKRIDGE GRINDAL NAUEN PLLP
100 Washington Avenue South, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900

1 Facsimile: (612) 339-0981
2 bdclark@locklaw.com
3 lmmatson@locklaw.com
4 aswagner@locklaw.com
5 cmabotsi-kowo@locklaw.com

6 Stephen J. Teti (admitted *pro hac vice*)
7 **LOCKRIDGE GRINDAL NAUEN PLLP**
8 265 Franklin Street, Suite 1702
9 Boston, MA 02110
10 Telephone: (617) 456-7701
11 sjteti@locklaw.com

12
13 *Counsel for Individual and Representative
14 Plaintiffs and the Proposed Class*

15 **SIGNATURE ATTESTATION**

16 I, David H. Kramer, am the ECF User whose ID and password are being used to file this
17 document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence
18 in the filing of this document has been obtained from the other signatory.

19
20 By: /s/ David H. Kramer
21 David H. Kramer
22
23
24
25
26
27
28

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2025

Hon. Eumi K. Lee
United States District Court Judge